



National Association of Charterboat Operators

P.O. Box 2990 Orange Beach, AL 36561

Phone (251-981-5136) Fax (251-981-8191)

E-Mail: info@nacocharters.org Web: www.nacocharters.org

Bobbi M. Walker
Executive Director

Bob Zales, II
Panama City Boatman Association
President

Ed O'Brien
Maryland Charter Boat Association
First vice-president

Tom Becker
Mississippi Charter Boat Captains
Second vice-president

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Charterboat Assoc. of Puget Sound
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Michigan City Charter Boat Assoc.
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Cape Cod Charter Boat Association
Cape May Co. Party & Charter Boat Assoc.
Captree Boatman Open & Charter Boats
Charterboat Association of Puget Sound
Chicago Sportfishing Association
Coastal Bend Guides Association
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Destin Charterboat Association
Eastern Lake Erie Charter Boat Assoc.
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Greater Point Pleasant Charter Boat Assoc
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Homer (AK) Charter Association
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Islamorada Charterboat Association
Kenosha (WI) Charter Boat Association
Maine Association of Charterboat Captains
Marathon Guides Association
Marco Island Charter Captains Assoc.
Maryland Charterboat Association
Michigan City Charter Boat Association
Mississippi Charterboat Captains Assoc.
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Petersburg (AK) Charterboat Association
Port Aransas (TX) Boatmen, Inc.
Prince William Sound Charter Boat Assoc.
Seward Charterboat Association
Sitka (AK) Charter Boat Operators Assoc.
United Boatmen of New Jersey
Virginia Charter Boat Association
Waukegan Charter Boat Association
Westport Charterboat Association

July 15, 2011

The Honorable Julius Genachowski Chairman
U.S. Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Sent Electronically

Subject: IB Docket Number 11-109. FCC File No. SAT-Mod-20101118-00239, LightSquared Subsidiary LLC (LightSquared) Request for Modification of its Authority for an Ancillary Terrestrial Component

Dear Chairman Genachowski:

NACO is a National Association of Charter Boat Owners and Operators that was created in 1991. We represent owners and operators of for-hire vessels across the United States and our Board of Directors consist of members from Alaska to Maine, including the Great Lakes. Our members are marine charters who provide fishing, sailing, diving, eco-tours, and other excursion vessels that carry passengers for hire. We are the premiere Association that represents professional charter boat interests in our country.

We have serious concerns about the current waiver request from LightSquared to operate high-powered terrestrial transmitters on a radio frequency adjacent to the satellite-based Global Positioning System (GPS). Independent studies indicate that LightSquared's terrestrial operations could completely knock out GPS receivers for miles around each transmitter.

Our membership depends on accurate GPS signals while we are navigating our oceans. Recently, the U.S. Coast Guard, due to money constraints, had to shut down Loran C, which was the other navigational system we used in U.S. waters. We absolutely cannot have anyone jeopardizing our GPS system.

Passenger and crew safety is our paramount concern. Passengers and crews deserve and expect precise navigation and we should provide all safety measures to ensure they enjoy safe and unobstructed transit of our waterways and oceans. The current GPS system provides a means where this safety is enhanced. Vessels now utilize many GPS enabled devices that not only provide the vessel position but there are also navigational plotters to ensure the vessels navigate through proper channels and areas free of obstructions. A loss of GPS signal could serious jeopardize this safe navigation, especially in adverse weather conditions. Such loss of signal could cause a vessel to encounter an area where obstructions or shallow waters exist causing an unexpected grounding, or worse case, sinking which could cause potential physical harm to passengers or crew. An absolute worst case could result in death. Clearly, the FCC does not want to be in a position of approving any system that could endanger the safety of individuals.

We believe there must be an appropriate compromise, either in transmitter signal power, frequency choice, or other variables, that will permit all users of radio frequency to coexist safely. Until we discover what that compromise may be, we must not permit one user to squelch another, especially when the current user impacts so many people in so many critical situations. While we fully support any reasonable compromise, we must insist that any compromise ensure the continued capability of all GPS receivers to provide accurate positions. As we have stated, safety of our passengers and crews is our foremost concern.

We ask that you take careful consideration of the potential harm LightSquared's proposed plan would have on small businesses across the U.S. who are users of GPS.

Thank you for the opportunity to submit comments for the official record.

Sincerely,

Bobbi M. Walker
Executive Director

